

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

MAXWELL KADEL, *et al.*,
Plaintiffs,

v.

DALE FOLWELL, *et al.*,
Defendants.

No. 1:19-cv-00272-LCB-LPA

**STATE HEALTH PLAN DEFENDANTS'
MOTION IN LIMINE TO EXCLUDE EXPERT TESTIMONY
BY GEORGE BROWN, M.D., AND LOREN SCHECHTER, M.D.**

Defendants, the North Carolina State Health Plan for Teachers and State Employees, Dale Folwell (in his official capacity as State Treasurer of North Carolina), and Dee Jones (in her official capacity as Executive Administrator of the State Health Plan) (the Plan Defendants), by and through undersigned counsel, respectfully move this Court to exercise its “special gatekeeping obligation,” *Sardis v. Overhead Door Corp.*, 10 F.4th 268, 281 (4th Cir. 2021) (citing *Daubert v. Merrell Dow Pharms., Inc.*, 509 U.S. 579, 592–93 (1993)), to exclude—under Rule 702—the expert testimony of George Brown, M.D. and Loren Schechter, M.D. Fed. R. Evid. 702. A supporting memorandum is filed contemporaneously herewith. A hearing upon this Motion *in Limine* is respectfully requested.

Respectfully submitted this the 10th day of June, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of June, 2022, the foregoing *Motion in Limine* was filed electronically with the Clerk of Court using the CM/ECF electronic filing system, which will send notification of such filing to all registered users.

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